

TYLER REVELS #228242
MARIN COUNTY JAIL
13 PETER BEHR DRIVE
SAN RAFAEL, CA 94903

8/21/2023

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TYLER REVELS

PLAINTIFF,

V.

CASE No. C22-06723 JST (PR)

"SECOND AMENDED COMPLAINT"

MARIN COUNTY JAIL, et al.,

CAPTAIN HALE, ALEKSEI RAJMACHVILI,

KYLE HARA, REBECA QUEZADA,

JOSEPH BIELESALO

DEFENDANTS.

A. ARGUMENT

ON AUGUST 7, 2022, I TYLER REVELS WAS HOUSED IN MCJ'S SPECIAL HOUSING UNIT, UPPER TIER, CELL NO. 19. AS AN INMATE THAT IS DIAGNOSED WITH EPILEPSY, IT IS NURSING SUPERVISOR ALEKSEI RAJMACHVILI, AND NURSE PRACTITIONER JOSEPH BIELESALO'S DUTY TO HOUSE INMATES ON LOWER TIER, LOWER BUNK TO SUPERVISE SEIZURE DISORDERS. AROUND 11:00AM THAT DAY, I EXPERIENCED BOTH A GRAND MAL SEIZURE AND AN ANXIETY ATTACK. POD WORKERS AND INMATES NOTIFIED THE POD DEPUTY AND MULTIPLE JAIL DEPUTIES, NURSING STAFF, AND A SERGEANT WERE SUMMONED.

AS I RECOVERED FROM THE SEIZURE, I SUFFERED FROM AN ASTHMA ATTACK DUE TO A LACK OF OXYGEN. ~~AND~~ THERE WAS A 20 MINUTE DELAY IN MEDICAL CARE BEING PROVIDED TO ME. MEDICAL STAFF WERE UNSUCCESSFUL IN CONTROLLING MY ASTHMA ATTACK.

MY BLOOD PRESSURE WAS ELEVATED, I WAS UNABLE TO SPEAK, GET UP OR WALK DUE TO MY ASTHMA ATTACK. WHICH CAUSED UNKNOWN DEPUTIES TO GRAB ME AND SIT ME UP SO MEDICAL STAFF COULD ADMINISTER BREATHING TREATMENTS. AS I WAS STRUGGLING TO BREATHE AND SHAKING UNCONTROLLABLY THE DEPUTIES AND MEDICAL STAFF LAUGHED, YELLED, AND MADE OBSCENE JOKES ABOUT MY LIFE/DEATH THREATENING CONDITION. AS THE MEDICAL STAFF CHECKED MY VITALS, MY BLOOD PRESSURE WAS VERY HIGH AND OXYGEN LEVEL WAS LOW, DEPUTIES SUGGESTED THAT I ROLL OVER AND DIE ALREADY.

CAPTAIN HALE IS LIABLE FOR IGNORING MY INTER-OFFICE CORRESPONDENCE REQUESTING TO BE IN GENERAL POPULATION ~~IN~~ A LOWER TIER, LOWER BUNK CELL. NURSE ALEXSEI RAJMACHVILI IS LIABLE FOR NOT PROVIDING ME WITH A LOWER TIER, LOWER BUNK CELL. NURSE PRACTITIONER JOSEPH BIELSELO IS LIABLE FOR REFUSING TO CALL AN AMBULANCE FOR ME TO HAVE THE HOSPITAL PERFORM DIAGNOSTICS ON ME. MENTAL HEALTH SUPERVISOR KYLE HARA AND PSYCHIATRIST REBECA QUEZADA ARE LIABLE FOR WRONGLY KEEPING ME IN SPECIAL HOUSING ON THE UPPER TIER WHEN I WAS NOT OF REQUIREMENT CRITERIA TO BE HOUSED THERE. INSTEAD OF BEING CLASSIFIED AS AN MEDICAL INMATE, I WAS WRONGLY CLASSIFIED AS AN MENTAL HEALTH INMATE.

MY EIGHTH AMENDMENT WAS VIOLATED BY DEPUTIES AND MEDICAL STAFF ACTING WITH DELIBERATE INDIFFERENCE TO MY MEDICAL NEEDS. MY ADA RIGHTS WERE VIOLATED BY THE DEFENDANTS HOUSING ME ON THE UPPER TIER AS AN INMATE WHO SUFFERS FROM SEIZURE DISORDER. I AM SEEKING MONETARY AND PUNITIVE DAMAGES AS A RELIEF. \$100,000.00 IN MONETARY DAMAGES AND \$100,000.00 IN PUNITIVE DAMAGES.

DATED: AUGUST 21, 2023

Tyler Revels
TYLER REVELS / PRO SE

TYLER REVELS #228242
MARIN COUNTY JAIL
13 PETER BEHR DRIVE
SAN RAFAEL, CA 94903

SAN FRANCISCO CA 940

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